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7 | *Attorneys for Defendant NETFLIX, INC.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

11 | LAURI VALJAKKA,

12 Plaintiff,

13

14 | NETFLIX, INC.,

15 Defendant.

Case No. 4:22-cv-01490-JST

**DEFENDANT NETFLIX, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED [LAMKIN DECLARATION ISO
UNOPPOSED MOTION TO MODIFY
THE SCHEDULING ORDER]**

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Netflix, Inc. (“Netflix”) hereby
 3 submits this administrative motion to consider whether material produced by non-party AiPi, LLC
 4 (“AiPi”) should be sealed. The declaration of Rachael Lamkin in support of Netflix’s Unopposed
 5 Motion to Modify the Scheduling Order and certain exhibits thereto include or describe documents
 6 that AiPi has produced to Netflix that are designated CONFIDENTIAL pursuant to the Stipulated
 7 Protective Order Regarding the Disclosure and Use of Discovery Materials (ECF No. 56)
 8 (“Protective Order”) (see Declaration of Elise Edlin in Support of Administrative Motion, filed
 9 herewith). Specifically, based on AiPi’s designations, Netflix seeks to seal:

Document	Entirety Or Redacted
Declaration of Rachael Lamkin	Highlighted Redactions: • 4:3-27
Exhibits G through J to the Lamkin Declaration in Support of Unopposed Motion to Modify the Scheduling Order	Entirety

15 **II. STATEMENT OF COMPLIANCE**

16 Netflix has reviewed and complied with the Standing Order Governing Administrative
 17 Motions to File Materials Under Seal Before District Judge Jon S. Tigar. Netflix has also reviewed
 18 and complied with Civil Local Rule 79-5, including the requirement to file separate motions if a
 19 party seeks to file under seal a document containing “portions that more than one party bears the
 20 burden of showing is sealable.”

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1 Dated: March 14, 2025

PERKINS COIE LLP

3 By: /s/ Elise Edlin

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17 **Attorneys for Defendant NETFLIX, INC.**

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CERTIFICATE OF SERVICE

I, Kate Rose, declare:

3 I am a citizen of the United States and employed by the firm of Perkins Coie LLP in Santa
4 Clara County, California. I am over the age of eighteen years and not a party to the within-entitled
5 action. On March 14, 2025, I caused to be served a true copy of the sealed version of the
6 following documents

- **DECLARATION OF RACHAEL LAMKIN IN SUPPORT OF NETFLIX, INC.’S UNOPPOSED MOTION TO MODIFY THE SCHEDULING ORDER;**
- **EXHIBITS G-J.**

11 | upon counsel as listed below via electronic mail:

Brendan J. Klaproth
Klaproth Law PLLC
2300 Wisconsin Ave NW, Suite 100A
Washington, DC 20007
BKlaproth@klaprothlaw.com

16 Plaintiff Valjakka, who is presently not represented by counsel, has been served copies of
17 this Motion the supporting declaration of Elise Edlin, and the proposed order. Because Mr.
18 Valjakka is a sender and/or recipient of the emails AiPi identified as Confidential that are the
19 subject of this Motion, Netflix is also serving the materials discussed in the bullets above on Mr.
20 Valjakka.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on
22 March 14, 2025.

/s/ Kate Rose
Kate Rose